

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Katten Muchin Rosenman LLP and Benesch, Friedlander, Coplan & Aronoff LLP hereby enter their appearance (the “Notice of Appearance”) in the above-captioned case as counsel to Edward Hightower and Adam Kroll, pursuant to sections 342 and 1109(b) of title 11 of the United States Code, 11 U.S.C §§ 101-1532, Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, and Rule 2002-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware. By this Notice of Appearance, Messrs. Hightower and Kroll request that copies of any and all notices and papers filed or entered in this case be given to and served upon the following:

Jennifer R. Hoover (DE No. 5111)  
Steven L. Walsh (DE No. 6499)  
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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

PLEASE TAKE FURTHER NOTICE that this constitutes not only a request for service of the notices and papers specified above, but also includes, without limitation, a request for service of all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, e-mail, or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, filing, claim, or suit is not intended nor shall be deemed to waive the rights of Messrs. Hightower and Kroll to: (1) have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a de novo review by a district court judge; (3) trial by jury in any case, proceeding, matter, or controversy so triable; (4) have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; (5) maintain any objection to the jurisdiction and/or venue of the Bankruptcy Court or any other court for any purpose; or (6) assert any other rights, claims, actions, defenses, setoffs, or recoupments to which Messrs. Hightower and Kroll are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

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Dated: September 19, 2023

Respectfully submitted,

/s/ Jennifer R. Hoover

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